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District of Nevada  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SHIRLETTA M. BAYLOR,

Plaintiff,

v.

ANDREW SAUL,  
Commissioner of Social Security,

Defendant.

Case No. 2:19-cv-00231-JAD-GWF

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME TO FILE  
CROSS-MOTION TO AFFIRM AND/OR  
RESPOND TO PLAINTIFF'S MOTION FOR  
REMAND.**

**(First Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from June 24, 2019 to July 24, 2019. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. In the last two months, Counsel for Defendant (Counsel) had four family tragedies, including the loss of her cousin, his wife, an uncle and a close family friend. Due to the back-to-back deaths, Counsel took time off to attend out of town funeral and prayer services. Counsel also has taken additional leave to care for her elderly mother, who became ill and required surgery in mid-May and had another follow-up surgery in June, with additional follow-up appointments. In addition,

1 Counsel also has over 100+ active social security matters, which require two or more dispositive  
2 motions until mid-September. As such, Counsel needs additional time to adequately review the  
3 transcript and properly respond to Plaintiff's Motion for Remand. The parties further stipulate that the  
4 Court's Scheduling Order shall be modified accordingly. Defendant makes this request in good faith  
5 with no intention to unduly delay the proceedings. Counsel apologizes for the belated request, but  
6 made her request as soon as reasonably practicable following her leave.  
7

8 Respectfully submitted,

9 Respectfully submitted,

10 Dated: June 24, 2019

/s/ Cyrus Safa  
(\*as authorized by email on June 24, 2019)  
CYRUS SAFA  
Attorney for Plaintiff

14 Dated: June 24, 2019

NICHOLAS A. TRUTANICH  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

18 By /s/ Tina L. Naicker  
19 TINA L. NAICKER  
20 Special Assistant U.S. Attorney  
Attorneys for Defendant

21 **ORDER**

22 APPROVED AND SO ORDERED:

24 DATED: June 25, 2019

  
THE HONORABLE GEORGE W. FOLEY  
UNITED STATES MAGISTRATE JUDGE